

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:)	
)	Chapter 11
)	
INVACARE CORPORATION, <i>et al.</i> , ¹)	Case No. 23-90068 (CML)
)	
Reorganized Debtors.)	(Jointly Administered)
)	

**KENCO TRANSPORTATION MANAGEMENT, LLC’S
WITNESS AND EXHIBIT LIST FOR MARCH 15, 2024 HEARING**

Kenco Transportation Management, LLC (“Kenco”) hereby files its Witness and Exhibit List for the hearing to be held on March 15, 2024, at 1:00 p.m. (prevailing Central Time) (the “Hearing”).

Based on Kenco’s discussions with the above-captioned debtors and debtors in possession, it is Kenco’s understanding that the hearing will again be a non-evidentiary status conference. Nevertheless, Kenco is filing this Witness and Exhibit List out of an abundance of caution.

WITNESSES

Kenco may call the following witnesses at the Hearing:

1. Michael McClelland, Senior Vice President at Kenco.
2. The witnesses listed in the Debtors’ Witness and Exhibit List, which Kenco anticipates will be filed prior to the Hearing.
3. Rebuttal witnesses as necessary.

¹ The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor’s federal tax identification number, are: Invacare Corporation (0965); Freedom Designs, Inc. (4857); and Adaptive Switch Laboratories, Inc. (6470). The corporate headquarters and the mailing address for the Debtors is 1 Invacare Way, Elyria, Ohio 44035.

4. Any witness called by any other party.
5. Kenco reserves the right to cross-examine any witness called by any other party.

EXHIBITS

Exhibit	Description	Mark	Offer	Object	Admit	W/D	Disposition after Trial
1	Transportation Management Agreement dated February 19, 2020.						
2	January 31 Letter.						
3	ACH receipt information reflecting Invacare Canada as originator of transfer.						
4	February 1 Letter.						
5	Post-petition invoice dated March 7, 2023.						
6	April 27, 2023, e-mail chain.						
7	May 8-9, 2023, e-mail chain.						
8	Proof of Claim No. 20-1 filed by Kenco Transportation Management LLC filed in Case No. 23-90068.						
9	Proof of Claim No. 20-2 filed by Kenco Transportation Management LLC in Case No. 23-90068.						
10	Proof of Claim No. 4-1 filed by Kenco Transportation Management LLC filed in Case No. 23-90067.						
11	Proof of Claim No. 4-2 filed by Kenco Transportation Management LLC filed in Case No. 23-90067.						
12	Proof of Claim No. 3-1 filed by Kenco Transportation Management LLC filed in Case No. 23-90066.						
13	Proof of Claim No. 3-2 filed by Kenco Transportation Management LLC filed in Case No. 23-90066.						

	Any document or pleading filed in the above-captioned cases.						
	Any exhibit identified or offered by any other party						
	Any exhibit necessary for impeachment and/or rebuttal purposes.						

RESERVATION OF RIGHTS

Kenco reserves the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserves the right to supplement this Witness and Exhibit List prior to the Hearing.

[Signature Page Follows]

Dated: March 13, 2024

Respectfully submitted,

**BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP**

/s/ Sven T. Nylén

Sven T. Nylén (admitted *pro hac vice*)
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-and-

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*Counsel to Kenco Transportation Management,
LLC*

CERTIFICATE OF SERVICE

I, Sven T. Nylén, hereby certify that on the 13th day of March, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Sven T. Nylén

Sven T. Nylén (admitted *pro hac vice*)